

PATRICK D. ROBBINS (CABN 152288)
Attorney for the United States
Acting under Authority Conferred by 28 U.S.C. § 515

MARTHA BOERSCH (CABN 126569)
Chief, Criminal Division

ABRAHAM FINE (CABN 292647)
MOLLY PRIEDEMAN (CABN 302096)
LLOYD FARNHAM (CABN 202231)
Assistant United States Attorneys

1301 Clay Street, Suite 340S
Oakland, California 94612
Telephone: (510) 637-3717
FAX: (510) 637-3724
Abraham.fine@usdoj.gov
Molly.priedeman@usdoj.gov
Lloyd.farnham@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHENG THAO,
ANDRE JONES,
DAVID TRUNG DUONG, and
ANDY HUNG DUONG,

Defendants.

NO.:

MOTION FOR SEALING ORDER

UNDER SEAL

FILED

JAN 09 2025

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

[Handwritten signature]

CR 25 0003 YGR

The United States, by and through its counsel, Assistant United States Attorneys Abraham Fine, Molly Priedeman, and Lloyd Farnham, moves this Court for an order sealing the government's application for a sealing order, the sealing order, the indictment, the arrest warrants, and all attachments in the above-referenced case. Disclosure of the specified documents might jeopardize the progress of this ongoing investigation that is neither public nor known to unidentified co-conspirators of the investigation. The United States requests that the indictment and arrest warrants be unsealed after the

1 United States has filed a notice with the Court confirming that defense counsel for one or more of the
2 defendants have been notified of the pending charges.

3 Accordingly, the United States requests that the Court seal these documents, except that the
4 Clerk of Court shall provide copies of the sealed documents to employees of the United States
5 Attorney's Office. The United States further requests that the United States Attorney's Office be
6 permitted to share these documents as necessary to comply with its discovery obligations, and with
7 agents of the FBI, IRS-CI and USPIS.

8 DATED: January 9, 2025

PATRICK D. ROBBINS
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U.S.C. § 515

11 /s/_____
12 ABRAHAM FINE
13 MOLLY K. PRIEDEMAN
14 LLOYD FARNHAM
Assistant United States Attorneys